

**UNITED BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Daneen Henderson : Chapter 13
:
: Bankruptcy No. 21-12592 amc
Debtor. :
:

COUNSEL'S CERTIFICATION IN OPPOSITION TO DISMISSAL

I, Marcia Y. Phillips, Esquire, do hereby depose and state:

1. Debtor filed her case in the fall of 2021, when the Chapter 13 Trustee changed from William Miller to Kenneth West.
2. The undersigned was awaiting introductory communication to her office that did not appear. Subsequently, I was informed that the trustee's office had all the documents it needed in this matter, but the 2021 tax return. As soon as Debtor supplied it to me and before the case was dismissed, the requested return was uploaded to the trustee website portal.
3. Suddenly a Motion to Dismiss for the failure to provide documents was filed and granted. An immediate motion to vacate dismissal was filed. It was delayed due to my husband's emergency surgery. The motion to vacate dismissal was granted.
4. The 341A First Meeting of Creditors was had. Debtor resumed making her trustee payments and this motion was filed to dismiss for the failure to make her earlier payments pursuant to her initial filed plan.
5. Debtor's plan is based upon a small amount of non-exempt equity that she is paying back through the plan. She was unable to make plan payments due the dismissal status of her case as mentioned above. She did make some trustee payments. She is now ready, willing and able to make additional trustee payments, under a modified feasible plan. But she needs additional time to modify her plan and to not have her matter dismissed again. Hence, debtor seeks to amend/modify her plan to recalculate the debt she will pay under this Chapter 13 that will bring her account current with the trustee.
6. Accordingly, the debtor seeks to amend the plan and desires that this court DENY a dismissal of her case herein.

Date: July 1, 2022

/s/ Marcia Y. Phillips, Esquire

Marcia Y. Phillips, Esquire

Counsel For Debtor Daneen Henderson